

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**TYHEE HICKMAN, SHANAY BOLDEN,
and O'DONALD HENRY, individually and
on behalf of all persons similarly situated,**

Plaintiffs,

v.

**TL TRANSPORTATION, LLC, SCOTT
FOREMAN, HERSCHEL LOWE,
AMAZON.COM, LLC, and AMAZON
LOGISTICS, INC.**

Defendants.

Civil Action No.: 2:17-cv-01038-GAM

Class & Collective Action

**PLAINTIFFS' UNOPPOSED MOTION FOR
ATTORNEYS' FEES AND COSTS**

Pursuant to Federal Rule of Civil Procedure 23(h), Class Counsel for Plaintiffs Tyhee Hickman, Shanay Bolden, and O'Donald Henry ("Plaintiffs"), individually and on behalf of all others similarly situated, respectfully seek reimbursement for attorneys' fees in the amount of Six Hundred Thousand Dollars (\$600,000.00) (which is one-third of the Gross Settlement Amount), and the payment of out-of-pocket costs incurred by Class Counsel, currently \$33,180.00, as established by the Settlement Agreement between the Named Plaintiffs and Defendants TL Transportation, LLC, Scott Foreman, Herschel Lowe, Amazon.com, LLC, and Amazon Logistics, Inc. (together, "Defendants").

This Motion is based on the accompanying Memorandum of Law, the Declarations of Class Counsel, and all other records, pleadings and papers on file in this action. Pursuant to the terms of the Settlement Agreement, Defendants do not oppose this Motion. Named Plaintiffs will submit a

proposed Order incorporating this relief in connection with their Motion for Final Approval of the Settlement on February 10, 2020.

Dated: January 10, 2020

Respectfully submitted,

/s/ Sarah R. Schalman-Bergen

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Settlement Class Member*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing was served upon all counsel of record through the Court's ECF system this 10th day of January 2020.

/s/ Sarah R. Schalman-Bergen
Sarah R. Schalman-Bergen